

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE EX PARTE APPLICATION OF  
NAVIOS SOUTH AMERICAN  
LOGISTICS INC,

Case No.: 24 MC 575 (LJL)

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**NOTICE OF MOTION**

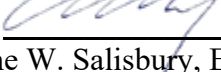
**PLEASE TAKE NOTICE** that Intervenor Claudio Pablo Lopez and Carlos Augusto Lopez (the “Lopezes” or “Intervenors”), will move before the Honorable Judge Lewis J. Liman for an Order to Quash the subpoenas issued in connection with the *ex parte* petition of Navios South American Logistics, Inc pursuant to 28 U.S.C. § 1782 and F.R.C.P. 45(d). This motion is supported by the accompanying Memorandum of Law, the Declaration of Mariela Ruanova, the exhibits thereto, the Declaration of David Kaplan, the exhibits thereto, the Declaration of Arsima Muller, and the exhibits thereto.

As detailed in the accompanying papers, Intervenor respectfully request that the Court enter an Order vacating the Discovery Order and quashing all subpoenas issued thereunder, in addition to further relief as the court may deem just and proper under the circumstances.

Dated: January 13, 2025

Respectfully submitted,

GUZOV, LLC

By:   
Anne W. Salisbury, Esq.  
437 Madison Avenue, 24th Floor  
New York, New York 10022  
Tel.: (212) 371-8008  
[asalisbury@guzovllc.com](mailto:asalisbury@guzovllc.com)

*Attorneys for Intervenors  
Claudio Pablo Lopez and  
Carlos Augusto Lopez*